

1 Pursuant to N.D. Cal. Civil Local Rule 6-2, Plaintiff Gong.io, Inc., (“Gong”) and
2 Defendant Hyperdoc Inc. d/b/a Recall.ai (“Recall”) file this stipulated request for an order
3 changing time to request that:

- 4 1. The deadline for Disclosure of Asserted Claims and Infringement Contentions
5 (Patent L.R. 3-1 and 3-2) be moved from July 25, 2025, to August 8, 2025—an
6 extension of ten business days to accommodate unforeseen personal circumstances
7 affecting a key consultant.

8 To maintain the deadlines contemplated in the Civil and Patent Local Rules in view of the
9 above extension, and to accommodate holidays, the parties further stipulate and request that:

- 10 2. The deadline for the Invalidity Contentions (Patent L.R. 3-3 and 3-4) be moved
11 from September 10, 2025, to September 22, 2025;
12 3. The deadline for Exchange of Proposed Terms for Construction (Patent L.R. 4-1)
13 be moved from September 24, 2025, to October 6, 2025.
14 4. The deadline to Exchange Preliminary Claim Constructors and Extrinsic
15 Evidence (Patent L.R. 4-2) be moved from October 15, 2025, to October 27, 2025.
16 5. The deadline for Damages Contentions be moved from October 30, 2025, to
17 November 12, 2025.
18 6. The deadline for the Joint Claim Construction and Prehearing Statement and
19 Expert Reports (Patent L.R. 4-3) be moved from November 12, 2025, to
20 November 21, 2025.
21 7. The deadline for Responsive Damages Contentions (Patent L.R. 3-9) be moved
22 from December 1, 2025, to December 11, 2025.
23 8. The deadline for the Completion of Claim Construction Discovery (Patent L.R. 4-
24 4) be moved from December 4, 2025, to December 21, 2025.
25 9. The deadline for the Opening Claim Construction Brief (L.R. 4-5(a)) be moved
26 from December 19, 2025, to January 5, 2026.
27 10. The deadline for the Responsive Claim Construction Brief (Patent L.R. 4-5(b)) be
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moved from January 9, 2026, to January 20, 2026.

11. The deadline for the Reply Claim Construction Brief (Patent L.R. 4-5(c)) be moved from January 16, 2026, to January 26, 2026.

12. The deadline for the Damages Contention Meeting (Patent L.R. 3-10) be moved from January 30, 2026, to February 9, 2025.

The current schedule and the parties' requested modifications are summarized below:

Event	Current Deadline	Requested Modification
Disclosure of Asserted Claims and Infringement Contentions (Patent L.R. 3-1 and 3-2)	July 25, 2025	August 8, 2025
Invalidity Contentions (Patent L.R. 3-3 and 3-4)	September 10, 2025	September 22, 2025
Exchange of Proposed Terms for Construction (Patent L.R. 4-1)	September 24, 2025	October 6, 2025
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (Patent L.R. 4-2)	October 15, 2025	October 27, 2025
Damages Contentions (Patent L.R. 3-8)	October 30, 2025	November 12, 2025
Joint Claim Construction and Prehearing Statement and Expert Reports (Patent L.R. 4-3)	November 12, 2025	November 21, 2025
Responsive Damages Contentions	December 1, 2025	December 11, 2025
Completion of Claim Construction Discovery	December 4, 2025	December 21, 2025
Opening Claim Construction Brief (Patent L.R. 4-5(a))	December 19, 2025	January 5, 2026
Complete ADR	December 31, 2025	-
Responsive Claim Construction Brief (Patent L.R. 4-5(b))	January 9, 2026	January 19, 2026
Reply Claim Construction Brief (Patent L.R. 4-5(c))	January 16, 2026	January 26, 2026
Tutorial hearing	January 21, 2026 2pm	February 18, 2026 at 2 pm
Damages Contention Meeting (Civ. L.R. 3-10)	January 30, 2026	February 9, 2025

Event	Current Deadline	Requested Modification
Claim construction hearing	February 4, 2026 at 2pm	March 4, 2026 at 2 pm
Close of Fact Discovery	April 17, 2026	-
Opening Expert Reports	May 15, 2026	-
Rebuttal Expert Reports	June 12, 2026	-
Close of Expert Discovery	July 3, 2026	-
Deadline to File Dispositive/Daubert Motions	Motions: July 24, 2026 Responses: August 7, 2026 Replies: August 14, 2026	-
Last Day to Hear Dispositive/Daubert Motions	September 16, 2026 at 9:00 a.m.	-
Joint Pretrial Conference Statement	November 4, 2026	-
Pretrial Conference	November 18, 2026 at 2:00 p.m.	-
Trial	November 30, 2026 at 9:00 a.m. (5 days)	-

The prior time modifications in the case were rescheduling the Case Management Conference (ECF No. 19), a stipulated extension for Recall to respond to the complaint (ECF No. 23), and a stipulated extension in light of Defendants' counsel's trial schedule (ECF No. 37). The proposed modifications do not affect any hearing dates, discovery cutoffs, dispositive motion deadlines, or trial.

Pursuant to Civ. L.R. 6-2, a supporting declaration is attached.

1 Dated: July 22, 2025

ORRICK, HERRINGTON & SUTCLIFFE LLP

3 By: /s/ Raghav Krishnapriyan

4 Raghav Krishnapriyan

5 *Attorneys for Plaintiff*
GONG.IO, INC.

7 Dated: July 22 2025

MORRISON & FOERSTER LLP

9 By: /s/ Timothy C. Saulsbury

10 Timothy C. Saulsbury

11 *Attorney for Defendant*
HYPERDOC INC. d/b/a RECALL.AI

Attestation Re Electronic Signatures

I, Raghav Krishnapriyan, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 22, 2025

By: /s/ Raghav Krishnapriyan
Raghav Krishnapriyan

1 **[PROPOSED] ORDER**

2 Good cause appearing, Gong.io, Inc and Hyperdoc Inc. d/b/a Recall.ai's Request for Order

3 Changing Time is **GRANTED AS MODIFIED.**

4 *****The parties' stipulation has incorrect dates. The Technology Tutorial is on**
5 **February 18, 2026, at 2 p.m. The Claim Construction Hearing is on March 4, 2026, at**
6 **2 p.m. See ECF No. 37.**

7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

8 Dated: **July 24, 2025**

9 By: 
10 Honorable Noël Wise
United States District Court Judge